



2600 Maitland Center Pkwy.  
Suite 300  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL  
32790-0200  
Tel: 407-740-8575  
Fax: 407-740-0613  
www.tminc.com

February 27, 2009  
*Via ECFS Transmission*

Marlene H. Dortch, Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW – Suite TW-A325  
Washington, D.C. 20554

**RE: EB Docket No. 06-36**  
**2008 CPNI Certification Filing for Matrix Telecom, Inc.**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. § 64.2009(e), Matrix Telecom, Inc. hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2008 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3001 or via e-mail at [tfortes@tminc.com](mailto:tfortes@tminc.com) if you have any questions about this filing.

Thank you for your assistance with this issue.

Sincerely,

Thomas Forte  
Consultant to Matrix Telecom, Inc.

*Enclosure*

Copy: Enforcement Bureau (*provided via ECFS website*)  
Best Copy and Printing ([FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
S. Klopach - Matrix  
TMS: FCx0901  
File: Matrix – FCC Certs / Orders

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: 2008

Name of company covered by this certification: Matrix Telecom, Inc.

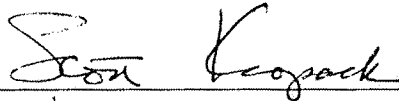
Form 499 Filer ID: 802572

Name of signatory: Scott Klopach

Title of signatory: Vice President of Regulatory Affairs and General Counsel

I, Scott Klopach, certify and state that:

1. I am the Vice President of Regulatory Affairs and General Counsel of Matrix Telecom, Inc. and, acting as an agent of the company, I have personal knowledge of Matrix's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Matrix's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.
4. The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. Additionally, the Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI



\_\_\_\_\_  
Scott Klopach  
Matrix Telecom, Inc.

2/26/09

\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

**Matrix Telecom, Inc.**  
**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

Matrix Telecom, Inc., ("Matrix" or "Company") provides presubscribed local and long distance services to residential and business customers. The Company provides the following as its Statement of CPNI compliance.

The Company uses CPNI, upon occasion, to market services to its customers and notifies its customers of their right to restrict use of, disclosure, and access to their CPNI, prior to asking for approval to use CPNI. Customer approval is obtained using opt-out approval and the Company establishes and maintains records establishing that notice was provided and approval was obtained. The Company maintains a record of all sales and marketing campaigns that use CPNI.

Matrix's utilizes both direct billing and LEC billing and has taken steps to secure CPNI and manage its release in accordance with FCC rules. The company has put into place processes to safeguard its customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

User account information can only be accessed by authorized representatives of the company. Such authorized representatives have access to customer records management systems only via an established password protected account set-up in their name by a system administrator. When the Company agent accesses customer information of any type, an audit log is created on the account that indicates the company agent that accessed the records. Additionally, access to CPNI used for the purpose of reporting and managing the business is centralized to the Company's Reporting Group that has limited password access to customer information.

Every employee that has access to CPNI is trained by the Company. All customer service personnel go through special CPNI training and must take and pass a test to ensure that they understand the policy. Call quality monitoring is done on each agent on a monthly basis, within this monitoring, procedures are reviewed and if not followed, progressive discipline action is performed. The marketing department has likewise been trained by the legal department regarding when and how they may use CPNI.

Call detail information is provided over the telephone to customers. Employees must verify the caller obtaining CPNI information, verification steps are: Name/Address/Social Security #, Date of Birth. If Social Security # or Date of Birth is not available to verify on the account, the agent must review Caller ID display to make sure caller is calling from the telephone number in question. If caller is not, the agent advises that they can't issue any further information unless they are able to contact them back at the telephone number in question.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

**Matrix Telecom, Inc.**  
**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**  
**(Continued)**

The Company does not have retail locations and therefore does not disclose CPNI in-store.

Company notifies customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information): password changes, change in a response to a back-up means of authentication, change to an on-line account, change or creation of an address of record other than at service initiation.

The Company has not taken any actions against data brokers in the last year.

The Company does have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The company maintains a record of any breaches discovered and notifications made to the USSS and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.